

KML LAW GROUP, P.C.
A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
www.kmllawgroup.com

April 12, 2024

The Honorable John K. Sherwood, U.S.B.J.
Courtroom # 3D
50 Walnut Street, 3rd Floor
Newark, NJ 07102

RE: Teresa Lai
Case No. 23-14800-JKS
Premises: 11 Klein Court, Old Tappan, NJ 07675
Secured Creditor: U.S. Bank Trust National Association, not in its individual capacity,
but solely as trustee of Citigroup Mortgage Loan Trust 2018-RP3

Dear Judge Sherwood,

This office represents U.S. Bank Trust National Association, not in its individual capacity, but solely as trustee of Citigroup Mortgage Loan Trust 2018-RP3, (“Secured Creditor”), holder of a mortgage on real property located at 11 Klein Court, Old Tappan, NJ 07675. Please accept this letter in response to Debtor’s motion to sell the subject property.

Debtor’s motion to sell provides for a short payoff of Secured Creditor’s lien. However, to do, Secured Creditor has not agreed to a short sale. Unless and until Secured Creditors and the junior lien holders consent to a short sale of the property, the Debtor cannot proceed with the current contract.

Because the short sale has not been approved, the Debtor’s motion to approve the sale of the property, with the contract currently before this Court, should be denied.

Respectfully,
KML LAW GROUP, P.C.

/s/ Denise Carlon, Esq.
Denise Carlon, Esquire
dcarlon@kmllawgroup.com
Attorney for Secured Creditor

Caption in Compliance with D.N.J. LBR-9004-1

KML Law Group, P.C.
By: Denise Carlon Esquire
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
Attorneys for Secured Creditor: U.S. Bank
Trust National Association, not in its
individual capacity, but solely as trustee of
Citigroup Mortgage Loan Trust 2018-RP3

In Re:
Teresa Lai

Debtor

Case No: 23-14800 JKS
Chapter: 13
Judge: John K. Sherwood

CERTIFICATION OF SERVICE

1. I, Patricia Rychards:

☐ Represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Denise Carlon, who represents the Secured Creditor in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On 04/12/2024, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Motion to Sell
- Certification of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 04/12/2024

/s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
Teresa Lai 11 Klein Court Old Tappan, NJ 07675	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)
Melissa Wotton The Law Office of Charles Higgs 2 Depot Plaza Ste First Floor, Suite 4 Bedford Hills,, NY 10507	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Road, Suite 330 Fairfield, NJ 07004-1550	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)